

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

John Doe,)	
)	
Plaintiff,)	
)	
v.)	No. 2:22-CV-4164 SRB
)	
Advanced Correctional Healthcare, Inc., et al.,)	
)	
Defendants.)	

**Consent Motion to Amend the Expert Designation Deadlines in the
Scheduling and Trial Order**

Plaintiff respectfully moves to amend the Expert Designation Deadlines in the Scheduling and Trial Order (Doc. 61). In support, Plaintiff states that:

1. The First Amended Complaint was filed on December 13, 2022. (Doc. 38).
2. Pursuant to the Notice of Inclusion in the Mediation and Assessment Program, the case was assigned to United States Magistrate Judge, Willie J. Epps, Jr. (Doc. 9).
3. Mediation via video conference was initially scheduled for March 28, 2023. (Doc. 37).
4. Mediation via video conference was then rescheduled and moved to April 27, 2023. (Doc. 64). The parties are currently prepared to mediate the case on April 27, 2023.
5. Plaintiff's Expert Designation Deadline is currently May 15, 2023. (Doc. 61).
6. Defendants' Expert Designation Deadline is currently September 1, 2023. (Doc. 61).
7. Plaintiff's Expert Designation Deadline is less than three weeks after mediation.
8. Plaintiff requests that his Expert Designation Deadline be moved to June 29, 2023.
9. Plaintiff has conferred with counsel for Defendants, and based upon those discussions, requests that Defendants' Expert Designation Deadline be moved to September 29, 2023.

10. These extensions would assist in facilitating mediation without causing experts to draft reports should the case be resolved.

11. The requested extensions for expert disclosures do not affect any other deadlines.

12. All Defendants have consented to this motion.

WHEREFORE, for the reasons stated above, Plaintiff respectfully requests that Plaintiff's Expert Designation Deadline be moved from May 15, 2023, to June 29, 2023, and Defendants' Expert Designation Deadline be moved from September 1, 2023, to September 29, 2023.

Respectfully submitted,

/s/ Gillian R. Wilcox
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Attorneys for Plaintiff

Certificate of Service

I hereby certify that on April 7, 2023, a true and correct copy of the foregoing motion was electronically filed using the Court's CM/ECF online case filing system, where it will appear to all counsel of record.

/s/ Gillian R. Wilcox